

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

WALDEMAR PEREZ-QUINTANA,
Defendant.

CRIMINAL NO. 97-145(DRD)

**UNITED STATES' MOTION IN OPPOSITION
TO EARLY TERMINATION OF PROBATION TERM**

TO THE HONORABLE COURT:

COMES NOW, the United States of America, by and through the undersigned attorneys, and respectfully states and prays as follows:

1. On June 3, 2008, this Honorable Judge entered an Order for the United States Attorney's Office to inform the court its position regarding the early termination of the Probation/Supervised Release term requested by the defendant.

2. In Compliance with said Order, the United States hereby respectfully submits that it opposes that early termination of defendant's probation/supervise release term requested. The court presided over a four month long trial and over sentencing hearings that lasted over a year in the captioned case. During that time, the court witnessed the high level of culpability of the defendant, his significant role in the offense, the substantial monetary benefits for him and his family resulting from the malicious embezzlement of federal public funds assigned for the relief of the most needy—the elderly, battered women. The court reviewed carefully all the evidence on the record for an extended period of time, and sentenced the defendant to the terms specified in the Judgment. The United States abides by the decision entered by the court, and respectfully submits that completion of such sentence—and not an early termination—best serves the ends of justice, as decided and explained by the court. In addition, the sentence imposed by the court should remain and not be terminated early so that it serves as a deterrence factor to others that might be commit a similar act of embezzlement. Sentences imposed in federal court will be served

in its totality and only in very spare and highly justified cases will they be shortened. No justification has been advanced on behalf of the defendant to justify the court's reevaluation of the sentence already imposed.

WHEREFORE, the United States requests that the Court take notice of its compliance with its Order, and its request that the defendant completes in full the sentence imposed by the court.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of June 2008.

ROSA EMILIA RODRIGUEZ
United States Attorney

/s/ _____
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification to attorney of record.

/s/ _____
Desirée Laborde-Sanfiorenzo 207701
Assistant U.S. Attorney